

KURT F. JOHNSON 13177-081
P.O. BOX 1000
MARION, IL 62959

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Case No.: 18-cr-40043

Plaintiff,

MOTION FOR A BILL OF PARTICULARS

v.

KURT JOHNSON,

Defendant.

The defense seeks a bill of particulars for clarification of the charging instrument. This was attempted informally but as this court heard on 9-14-18 Quinley chose to remain silent, not respond, and not to inform the defense of these intentions. These inactions cause unnecessary delay and the prejudice of not being able to prepare a motion to dismiss the indictment in a timely fashion. For this reason the court should order Quinley to supply the particulars forthwith and to allow the untimely filing of the motion to dismiss, and allow for leave to amend if the presumptions formed by lack of clarity prove false. It is requested that if this court finds any of the requests for clarity unnecessary that it will state its reason why and that those that are not thus denied will be answered upon the record by Quinley since time prohibits anything but immediacy. The informal requests are hereby attached for consideration. Lastly the defense would add from paragraph 3 the word "resources" appear to be an indeterminate reference of measure. Clarity is needed as to what is being measured and what is the instrument of measure being used. (i.e. dollars, lbs., time etc.)

September 18, 2018

Respectfully submitted,

By: 

Executor Kurt F. Johnson for
KURT F. JOHNSON Defendant.

KURT JOHNSON 13177-081
UNITED STATES PENITENTIARY
P.O. BOX 1000
MARION, IL 62959

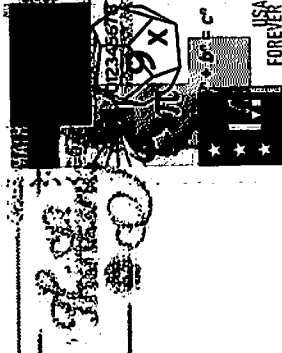
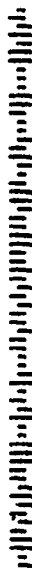
SAINT LOUIS MO 630

19 SEP 2018 PM 5 L

⇔ 13177-081 ⇔
U S Dist Court
301 W MAIN ST
Benton, IL 62812
United States

NOTE: CTU and all ASSOCIATES: The use of your criminal mail system by necessity is not acceptance and no claim of injury is hereby waived.

62812-136201



RECEIVED

SEP 21 2018

**CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
BENTON OFFICE**